

**Commonwealth of Kentucky
Environmental and Public Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382**

Final

**AIR QUALITY PERMIT
Issued under 401 KAR 52:020**

Permittee Name: BPB Manufacturing, Inc.
Mailing Address: P.O. Box 560, Carrollton, Kentucky 41008

Source Name: BPB Manufacturing, Inc.
Mailing Address: P.O. Box 560
Carrollton, Kentucky 41008

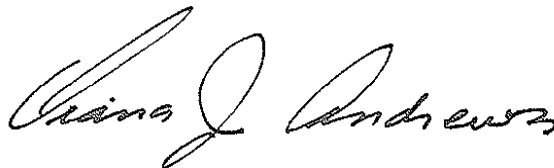
Source Location: 6040 U.S. Highway 42 East
Carrollton, Kentucky 41008

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Regional Office: Florence Regional Office
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Application
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**John S. Lyons, Director
Division for Air Quality**

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SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

EG01 – Material Handling

Emission Unit #	Description	Maximum Capacity	Construction Commenced	Control Device
EP H	FB Stucco Cooler	80 tons per hour	2000	Baghouse
EP I	Vermiculite Bin	5 tons per hour	2000	Bin Vent Filter
EP J	Clay Bin	2.8 tons per hour	2000	Bin Vent Filter
EP K	Starch Silo	0.72 tons per hour	2000	Bin Vent Filter

APPLICABLE REGULATIONS:

401 KAR 59:010 *New Process Operations* commenced on or after July 2, 1975 applies to particulate matter (PM/PM₁₀) emissions and visible emissions from the FB Stucco Cooler (EP H).

401 KAR 60:670, *Standards of Performance for Nonmetallic Mineral Processing Plants*, applies to the sources that are subject to 40 CFR 60.670 to 60.676 (Subpart OOO).

40 CFR 60, Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants*, commenced on or after August 31, 1983 applies to the particulate matter (PM/PM₁₀) and visible emissions from the vermiculite bin (EP I), clay bin (EP J) and the starch silo (EP K).

1. Operating Limitations:

None

2. Emission Limitations:

- a. Mass Emission Limit pursuant to 401 KAR 59:010 Section 3(2): Particulate matter emissions from the FB Stucco Cooler (EP H) shall not exceed: $3.59 \times (\text{Tons Processed})^{0.62}$ lbs/hr for (Tons processed) less than 30 tons per hour, otherwise: $17.31 \times (\text{Tons Processed})^{0.16}$ lbs/hr, averaged over a three hour period.
- b. Mass Emission Limit pursuant to 40 CFR 60.672 (a)(1): Emissions of particulate matter (PM₁₀) from the Vermiculite Bin (EP I), Clay Bin (EP J), and Starch Silo (EP K) shall not exceed 0.05 g/dscm (0.022 grains/dscf) averaged over a three hour period.
- c. Opacity Limit pursuant to 401 KAR 59:010, Section 3(1)(a): Visible emissions from the FB Stucco Cooler (EP H) shall not equal or exceed 20% opacity on a 6-minute average basis.
- d. Opacity Limit pursuant to 40 CFR 60.672 (a)(2): Visible emissions from the Vermiculite Bin (EP I), Clay Bin (EP J), and Starch Silo (EP K) shall not exceed 7 percent on a one hour average basis.

Compliance Demonstration Method:

- a. For compliance with the mass emission limits, refer to **Testing Requirements 3.a and 3.b; 4. Specific Monitoring Requirements; and 5. Specific Record Keeping Requirements.**

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- b. For compliance with the opacity limits, refer to **Testing Requirements 3.c and 3.d.**
 - c. If any of the emission units associated with a fabric filter is in operation during any period of a malfunction of the fabric filter, the permittee shall determine compliance through maintenance of the records required by **5.c. Specific Recordkeeping Requirements** below. [Permit Number V-99-016, issued on September 3, 1999]
- 3. Testing Requirements:**
- a. The permittee shall use EPA Reference Method 5 or Method 17 and the procedures described in 40 CFR 60.675 to determine particulate matter concentration being vented to atmosphere from the Vermiculite Bin, Clay Bin, and Starch Silo to demonstrate compliance with **Emission Limitations 2.b.** The testing shall be performed once per permit term and the Division reserves the right to require additional testing.
 - b. The permittee shall use EPA Reference Method 5 or Method 17 to determine particulate matter concentration being vented to atmosphere from the FB Stucco Cooler baghouse to demonstrate compliance with **Emission Limitations 2.b.** The testing shall be performed once per permit term and the Division reserves the right to require additional testing.
 - c. Pursuant to 401 KAR 59:010, the Permittee shall use EPA Reference Method 9 and the procedures in 40 CFR 60.11 to determine opacity from the FB Stucco Cooler to demonstrate compliance with **Emission Limitations 2.a.** The testing shall be performed annually and the Division reserves the right to require additional testing.
 - d. The permittee shall use EPA Reference Method 9 and the procedures in 40 CFR 60.11 to determine opacity for the Vermiculite Bin, Clay Bin, and Starch Silo to demonstrate compliance with **Emission Limitations 2.d.** The testing shall be performed annually and the Division reserves the right to require additional testing.
- 4. Specific Monitoring Requirements:**
- a. For the FB Stucco Cooler baghouse, the permittee shall maintain, calibrate and operate according to manufacturers' specification, a monitoring device for the continuous measurement of the differential static pressure across the baghouse. [Permit Number V-99-016, issued on September 3, 1999]
 - b. The permittee shall monitor and record the pressure drop across all other fabric filters on a weekly basis. [Permit Number V-99-016, issued on September 3, 1999]

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- c. Pursuant to 40 CFR 64, the permittee shall comply with the requirements specified in **Specific Monitoring Requirements 4.a. and b. above** and Table 1 below to monitor emissions of particulate matter:

Table 1: Particulate Matter (PM) CAM Approach for the Fluid Bed Stucco Cooler (EP H)

<i>Applicable CAM Requirement</i>	<i>PM/PM₁₀ Limit</i>
General Requirements	<p>PM limitation: $3.59 \times (\text{Tons Processed})^{0.62}$ lbs/hr for (Tons processed) less than 30 tons per hour, otherwise: $17.31 \times (\text{Tons Processed})^{0.16}$ lbs/hr, averaged over a three hour period</p> <p>Opacity limitation: < 20% opacity on a 6-minute average basis</p>
Monitoring Methods and Location	<p>(1) PM determination: Continuously monitor the differential static pressure drop across the fluid bed stucco cooler baghouse, when the stucco cooler is in operation.</p> <p>(2) Opacity determination: Monitor the visible emissions of the fluid bed stucco cooler baghouse stack, when the fluid bed stucco cooler is in operation, at a frequency of once per day and record the data.</p>
Indicator Range/Corrective Action	<p>(1) PM: Based on prior monitoring data BPB Manufacturing defines the indicator range of the pressure drop for this unit as 3-6 inches water column.</p> <p>a. If the pressure drop range is outside of the indicator range, then calibrate and/or visually inspect the pressure drop monitor for quality assurance per manufacturer's recommendations.</p> <p>b. If the pressure drop range is outside of the indicator range, then initiate inspection of baghouse and/or the fluid bed stucco cooler and make any necessary repairs.</p> <p>(2) Opacity: Monitor the visible emissions for the baghouse stack, when the fluid bed stucco cooler is in operation, and record data to ensure it complies with the 20 % opacity limit.</p> <p>a. If any 6-minute average opacity observation is above trigger level (20%), then initiate inspection of baghouse and/or the fluid bed stucco cooler and make any necessary repairs.</p>
Data Collection Frequency and Recordkeeping	<p>(1) PM: Continuous recording of differential static pressure drop. Records will be maintained for a period of 5 years.</p> <p>(2) Opacity: A daily observation for a six-minute duration when unit is operating. If two consecutive readings show an exceedance of the opacity limit, initiate corrective action. Visible observations records will be kept in a designated logbook and maintained for a period of 5 years</p>
Averaging Period	<p>(1) PM: Averaged over a 3 hour period.</p> <p>(2) Opacity: 6 minute averages</p>

5. **Specific Record Keeping Requirements:**

The permittee shall maintain records of the following information:

- a. Continuous records of the differential static pressure across the FB Stucco Cooler baghouse (on strip chart recorder, electronic data acquisition system or equivalent). [Permit Number V-99-016, issued on September 3, 1999]
- b. Weekly records of the pressure drop across all other fabric filters. [Permit Number V-99-016, issued on September 3, 1999]

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- c. During all periods of a malfunction of any control equipment if any of the associated emission units are in operation, a daily (calendar day) log of the following information shall be kept: [Permit Number V-99-016, issued on September 3, 1999]

- i. Whether any air emissions were visible.

If visible emissions are observed, the permittee shall record the following information:

- ii. Whether the visible emissions were normal for the process.
 - iii. The color of the emissions and whether the emissions were light or heavy.
 - iv. The cause of the abnormal visible emissions.
 - v. Any corrective actions taken.

- d. All routine and nonroutine maintenance activities performed on the control equipment. [Permit Number V-99-016, issued on September 3, 1999]

6. Specific Reporting Requirements:

- a. Pursuant to 40 CFR 60.676 (f), the permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR 60.672, including reports of opacity observations made using Method 9 to demonstrate compliance with 40 CFR 60.672(b).

- b. Refer to **Section F, Condition 5.**

7. Specific Control Equipment Operating Conditions:

The pressure drop on a three-hour average shall be no less than 33% below that recorded during a required performance test for the FB Stucco Cooler baghouse. [Permit Number V-99-016, issued on September 3, 1999]

8. Alternate Operating Scenarios:

None

9. Compliance Schedule:

None

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EG02 – Dryers and Calciners

Emission Unit #	Description	Maximum Capacity	Construction Commenced	Control Device
EP A	Waste Gypsum Board Reclaimer	11.3 tons per hour	2000	Baghouse
EP B	FGD Drying System #1	53.5 tons per hour; 23.7 mmBtu/hr natural gas fuel	2000	Baghouse
EP C	FGD Drying System #2	53.5 tons per hour; 23.7 mmBtu/hr natural gas fuel	2000	Baghouse
EP D	Calcining Kettle #1 Burner	40 mmBtu/hr	2000	None
EP E	Calcining Kettle #1	50 tons per hour; baghouse flow rate: 12,700 acfm	2000	Baghouse
EP F	Calcining Kettle #2	50 tons per hour;; baghouse flow rate: 12,700 acfm	2000	Baghouse
EP G	Calcining Kettle #2 Burner	40 mmBtu/hr	2000	None
EP N	Board Dryer #1	47.2 tons per hour; 101 mmBtu/hr natural gas fuel; stack flow rate: 82,700 acfm	2000	None
EP O	Board Dryer #2	47.2 tons per hour; 101 mmBtu/hr natural gas fuel; stack flow rate: 82,700 acfm	2000	None

APPLICABLE REGULATIONS:

40 CFR 60, Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants*, commenced on or after August 31, 1983 applies to the particulate matter (PM/PM₁₀) and visible emissions from the Waste Gypsum Board Reclaimer (EP A), FGD Drying System #1 (EP B) and FGD Drying System #2 (EP C).

401 KAR 60:670, *Standards of Performance for Nonmetallic Mineral Processing Plants*, applies to the sources that are subject to 40 CFR 60.670 to 60.676 (Subpart OOO).

40 CFR 60, Subpart UUU, *Standards of Performance for Calciners and Dryers in Mineral Industries*, commenced on or after April 23, 1986 applies to the particulate matter (PM/PM₁₀) and visible emissions from the calcining kettles (EP E and EP F) and board dryers (EP N and EP O).

401 KAR 60:005, Section 3(1)(rrr), 40 CFR Part 60, Subpart UUU, *Standards of Performance for Calciners and Dryers in Mineral Industries*, incorporated by reference.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**1. Operating Limitations:**

None

2. Emission Limitations:

- a. Mass Emission Limit pursuant to 401 KAR 60:670 and 40 CFR 60.672(a)(1) (Subpart OOO): Emissions of particulate matter (PM/PM₁₀) from the Waste Gypsum Board Reclaimer, FGD Drying System #1 and FGD Drying System #2 shall each not exceed 0.05 g/dscm (0.02 grains/dscf) averaged over a three hour period.
- b. Mass Emission Limit pursuant to 401 KAR 60:005 and 40 CFR 60.732 (a) (Subpart UUU): Emissions of particulate matter (PM/PM₁₀) from Calcining Kettle #1, Calcining Kettle #2, Board Dryer #1 and Board Dryer #2 shall each not exceed 0.092 g/dscm (0.040 grains/dscf) averaged over a three hour period.
- c. Opacity Limit pursuant to 401 KAR 60:670 and 40 CFR 60.672 (a)(2) (Subpart OOO): Visible emissions from the Waste Gypsum Board Reclaimer, FGD Drying System #1 and FGD Drying System #2 shall each not exceed 7 percent on a one hour average basis.
- d. Opacity Limit pursuant to 401 KAR 60:005 and 40 CFR 60.732 (b) (Subpart UUU): Visible emissions from Calcining Kettle #1, Calcining Kettle #2, Board Dryer #1 and Board Dryer #2 shall each not exceed 10 percent on a 6-minute average basis.

Compliance Demonstration Method:

- a. For compliance with the mass emission limits, refer to **Testing Requirements 3.a and 3.c; 4. Specific Monitoring Requirements; and 5. Specific Record Keeping Requirements.**
- b. For compliance with the opacity limits, refer to **Testing Requirements 3.b and 3.d.**

3. Testing Requirements:

- a. The permittee shall use EPA Reference Method 5 or Method 17 and the procedures described in 40 CFR 60.675 to determine particulate matter concentration being vented to atmosphere from the Waste Gypsum Board Reclaimer, FGD Drying System #1 and FGD Drying System #2 to demonstrate compliance with **Emission Limitations 2.a**. The testing shall be performed once per permit term and the Division reserves the right to require additional testing.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- b. The permittee shall use EPA Reference Method 9 and the procedures in 40 CFR 60.11 to determine opacity for the Waste Gypsum Board Reclaimer, FGD Drying System #1 and FGD Drying System #2 to demonstrate compliance with **Emission Limitations 2.c**. The testing shall be performed annually and the Division reserves the right to require additional testing.
- c. The permittee shall use EPA Reference Method 5 and the procedures in 40 CFR 60.736 to determine particulate matter concentration for the Calcining Kettle #1, Calcining Kettle #2, Board Dryer #1 and Board Dryer #2 to demonstrate compliance with **Emission Limitations 2.b**. The testing shall be performed once per permit term and the Division reserves the right to require additional testing. The sampling time and volume for each test run shall be at least 2 hours and 1.70 dscm.
- d. The permittee shall use EPA Reference Method 9 and the procedures in 40 CFR 60.11 to determine opacity for the Calcining Kettle #1, Calcining Kettle #2, Board Dryer #1 and Board Dryer #2 to demonstrate compliance with **Emission Limitations 2.d**. The testing shall be performed annually and the Division reserves the right to require additional testing.

4. Specific Monitoring Requirements:

The permittee shall monitor and record the pressure drop across all fabric filters on a weekly basis. [Permit Number V-99-016, issued on September 3, 1999]

5. Specific Record Keeping Requirements:

The permittee shall maintain records of the following information:

- a. Weekly log of the pressure drop across all fabric filters. [Permit Number V-99-016, issued on September 3, 1999]
- b. All routine and nonroutine maintenance activities performed on the control equipment. [Permit Number V-99-016, issued on September 3, 1999]
- c. During all periods of a malfunction of any control equipment if any of the associated emission units are in operation, a daily (calendar day) log of the following information shall be kept: [Permit Number V-99-016, issued on September 3, 1999]
 - i. Whether any air emissions were visible.

If visible emissions are observed, the permittee shall record the following information:

- ii. Whether the visible emissions were normal for the process.
- iii. The color of the emissions and whether the emissions were light or heavy.
- iv. The cause of the abnormal visible emissions.
- v. Any corrective actions taken.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

6. Specific Reporting Requirements:

- a. Pursuant to 40 CFR 60.676 (f), the permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR 60.672, including reports of opacity observations made using Method 9 to demonstrate compliance with 40 CFR 60.672(b).
- b. Refer to **Section F, Condition 5.**

7. Specific Control Equipment Operating Conditions:

None

8. Alternate Operating Scenarios:

None

9. Compliance Schedule:

None

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EG03 (EP P) – Mill Building

Description	Maximum Capacity	Construction Commenced	Control Device
Two (2) Land Plaster Storage Bins	110 tons per hour each	2000	Baghouse
Two (2) Kettle Feed Bins	50 tons per hour each	2000	Bin Vent Filter
Land Plaster Bin	10 tons per hour	2000	Bin Vent Filter
Stucco Bin	100 tons per hour	2000	Bin Vent Filter
Two (2) Kettle Hot Pits	50 tons per hour each	2000	Bin Vent Filter

APPLICABLE REGULATIONS:

401 KAR 59:010 *New Process Operations* commenced on or after July 2, 1975 applies to particulate matter (PM/PM₁₀) emissions and visible emissions from the above affected facilities.

1. Operating Limitations:

None

2. Emission Limitations:

- a. Mass Emission Limit pursuant to 401 KAR 59:010 Section 3(2): Particulate matter emissions from the above shall not exceed: $3.59 \times (\text{Tons Processed})^{0.62}$ lbs/hr for (Tons Processed) less than 30 tons per hour, otherwise: $17.31 \times (\text{Tons Processed})^{0.16}$ lbs/hr, averaged over a three hour period.
- b. Opacity Limit pursuant to 401 KAR 59:010, Section 3(1)(a): visible emissions from the above affect facilities shall not equal or exceed 20% opacity on a 6-minute average basis.

Compliance Demonstration Method:

For compliance with the mass emission and opacity limits, refer to **4. Specific Monitoring Requirements**; and **5. Specific Record Keeping Requirements**.

3. Testing Requirements:

None

4. Specific Monitoring Requirements:

The permittee shall monitor and record the pressure drop across all fabric filters on a weekly basis. [Permit Number V-99-016, issued on September 3, 1999]

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

5. Specific Record Keeping Requirements:

The permittee shall maintain records of the following information:

- a. Weekly log of the pressure drop across all fabric filters. [Permit Number V-99-016, issued on September 3, 1999]
- b. All routine and nonroutine maintenance activities performed on the control equipment. [Permit Number V-99-016, issued on September 3, 1999]
- c. During all periods of a malfunction of any control equipment if any of the associated emission units are in operation, a daily (calendar day) log of the following information shall be kept: [Permit Number V-99-016, issued on September 3, 1999]
 - i. Whether any air emissions were visible.

If visible emissions are observed, the permittee shall record the following information:

- ii. Whether the visible emissions were normal for the process.
- iii. The color of the emissions and whether the emissions were light or heavy.
- iv. The cause of the abnormal visible emissions.
- v. Any corrective actions taken.

6. Specific Reporting Requirements:

Refer to **Section F, Condition 5.**

7. Specific Control Equipment Operating Conditions:

None

8. Alternate Operating Scenarios:

None

9. Compliance Schedule:

None

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EG04 (EP Q) – Manufacturing Building

Description	Maximum Capacity	Construction Commenced	Control Device
Stucco Day Bin	95 tons per hour	2000	Bin Vent Filter
Landplaster Bin	0.5 tons per hour	2000	Bin Vent Filter
Cerelose Bin	0.16 tons per hour	2000	Bin Vent Filter
Sugar Bin	0.06 tons per hour	2000	Bin Vent Filter
Boric Acid Bin	0.3 tons per hour	2000	Bin Vent Filter
Pin Mixer	135 tons per hour	2000	Bin Vent Filter
Spare Bin	1 ton per hour	2000	Bin Vent Filter
Dry Additives Conveyor	95 tons per hour	2000	Bin Vent Filter
Additive Hopper	9 tons per hour	2000	Bin Vent Filter
Foaming Agent Tank	3.32 gallons per hour	2000	None
Inkjet Printing system	0.16 gallons per hour	2000	None
End Trim	51.6 tons per hour	2000	Baghouse
Dunnage	4 tons per hour	2000	Baghouse

APPLICABLE REGULATIONS:

401 KAR 59:010 *New Process Operations* commenced on or after July 2, 1975 applies to particulate matter (PM/PM₁₀) emissions and visible emissions from the above affected facilities.

NON-APPLICABLE REGULATIONS:

401 KAR 59:210, *New fabric, vinyl and paper surface coating operations*, apply to each coating line for fabric, vinyl, or paper. Since the source does not perform any fabric, vinyl or paper coating, the requirements do not apply to the inkjet printing system in the manufacturing building.

401 KAR 59:212, *New graphic arts facilities using rotogravure and flexography*, does not apply to the inkjet printing system because the system does not use packaging rotogravure, specialty rotogravure or flexographic printing.

1. Operating Limitations:

None

2. Emission Limitations:

- a. Mass Emission Limit pursuant to 401 KAR 59:010 Section 3(2): Particulate matter emissions from the above shall not exceed: $3.59 \times (\text{Tons Processed})^{0.62}$ lbs/hr for (Tons Processed) less than 30 tons per hour, otherwise: $17.31 \times (\text{Tons Processed})^{0.16}$ lbs/hr, averaged over a three hour period.
- b. Opacity Limit pursuant to 401 KAR 59:010, Section 3(1)(a): visible emissions from the above affected facilities shall not equal or exceed 20% opacity on a 6-minute average basis.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)***Compliance Demonstration Method:***

- a. For compliance with the mass emission and opacity limits, refer to **4. Specific Monitoring Requirements**; and **5. Specific Record Keeping Requirements**.

3. Testing Requirements:

None

4. Specific Monitoring Requirements:

The permittee shall monitor and record the pressure drop across all fabric filters on a weekly basis. [Permit Number V-99-016, issued on September 3, 1999]

5. Specific Record Keeping Requirements:

The permittee shall maintain records of the following information:

- a. Weekly log of the pressure drop across all fabric filters. [Permit Number V-99-016, issued on September 3, 1999]
- b. All routine and nonroutine maintenance activities performed on the control equipment. [Permit Number V-99-016, issued on September 3, 1999]
- c. During all periods of a malfunction of any control equipment if any of the associated emission units are in operation, a daily (calendar day) log of the following information shall be kept: [Permit Number V-99-016, issued on September 3, 1999]
 - i. Whether any air emissions were visible.

If visible emissions are observed, the permittee shall record the following information:

- ii. Whether the visible emissions were normal for the process.
 - iii. The color of the emissions and whether the emissions were light or heavy.
 - iv. The cause of the abnormal visible emissions.
 - v. Any corrective actions taken.
- d. Quantity of all inks and foaming agents used. VOC and HAP content of all inks and foaming agents used. [Permit Number V-99-016, issued on September 3, 1999]

6. Specific Reporting Requirements:

Refer to **Section F, Condition 5**.

7. Specific Control Equipment Operating Conditions:

None

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

8. Alternate Operating Scenarios:

None

9. Compliance Schedule:

None

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:020, Section 6. While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

	<u>Description</u>	<u>Generally Applicable Regulation</u>
1.	Indirect heat exchangers or water heaters rated at one (1) million BTU per hour or less actual heat input that use #2 fuel oil, wood, natural gas, LP gas, or refinery fuel gas.	None
2.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) providing these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and do not otherwise trigger a permit modification.	None
3.	LPG Tanks	None
4.	Organic liquid storage tanks less than 10,000 gallon capacity with dispensing.	None
5.	Fugitive dust emissions from vehicle movement.	401 KAR 63:010
6.	Internal combustion engines rated at 50 hp or less that use only gasoline, diesel fuel, natural gas, or LP gas.	None
7.	Parts washer and related maintenance activity.	None
8.	Welding and fabrication activities.	401 KAR 59:010
9.	Wastewater treatment facilities used for domestic sewage only, excluding combustion or incineration equipment.	None

SECTION C - INSIGNIFICANT ACTIVITIES

- | | | |
|-----|--|----------------|
| 10. | Construction and routine maintenance and repair including solvent use, painting, degreasing, sweeping, abrasive use, and insulation removal. | None |
| 11. | HVAC and refrigeration equipment. | None |
| 12. | Vehicle and machinery cleaning, sanding, painting, buffing, and polishing activity. | None |
| 13. | Pest and Weed Control Activity | None |
| 14. | Wet Gypsum Storage piles | 401 KAR 63:010 |
| 15. | Wet Gypsum Truck unloading | 401 KAR 63:010 |
| 16. | Six (6) Paper Heaters (0.09 mmBtu/hr) | None |
| 17. | Dewatering Boiler (4.6 mmBtu/hr)
Natural gas fired
Located at the Ghent Power Station. | 401 KAR 59:015 |
| 18. | One (1) 20,000 gallon diesel fuel storage tank and three (3) pump distribution island. | None |
| 19. | Off-specification wallboard storage and front-end loader to transport off-specification wallboard. | 401 KAR 63:010 |

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.
2. In order to preclude being defined as a major source for particulate matter emissions over 250 tons per year in 401 KAR 51:017 Prevention of significant deterioration (PSD), the facility must maintain and operate all particulate matter controls on each controlled emission unit, whenever the emission unit is in operation.
3. NO_x, CO, and PM₁₀ emissions, measured by applicable reference methods, or an equivalent or alternative method specified in 40 C.F.R. Chapter I, or by a test method specified in the state implementation plan.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

1. Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b (IV)1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
 - a. Date, place as defined in this permit, and time of sampling or measurements;
 - b. Analyses performance dates;
 - c. Company or entity that performed analyses;
 - d. Analytical techniques or methods used;
 - e. Analyses results; and
 - f. Operating conditions during time of sampling or measurement.
2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Sections 1b(IV) 2 and 1a(8) of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
3. In accordance with the requirements of 401 KAR 52:020 Section 3(1)h the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
 - a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
 - b. To access and copy any records required by the permit;
 - c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.
4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
5. Summary reports of any monitoring required by this permit, other than continuous emission or opacity monitors, shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Section 1b (V)1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:020 Section 23. All deviations from permit requirements shall be clearly identified in the reports.
7. In accordance with the provisions of 401 KAR 50:055, Section 1 the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - a. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
8. The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7. above) to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report required by Section F.6 [Section 1b (V) 3, 4. of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
9. Pursuant to 401 KAR 52:020, Permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
 - a. Identification of the term or condition;
 - b. Compliance status of each term or condition of the permit;
 - c. Whether compliance was continuous or intermittent;
 - d. The method used for determining the compliance status for the source, currently and over the reporting period.
 - e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
 - f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the following addresses:

**SECTION F - MONITORING, RECORDKEEPING, AND REPORTING
REQUIREMENTS (CONTINUED)**

Division for Air Quality
Florence Regional Office
8020 Veterans Memorial Drive, Suite 110
Florence, KY 41042

U.S. EPA Region 4
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960

Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601

10. In accordance with 401 KAR 52:020, Section 22, the permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KYEIS emission survey is mailed to the permittee.
11. Results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days or sooner if required by an applicable standard, after the completion of the fieldwork.

SECTION G - GENERAL PROVISIONS**(a) General Compliance Requirements**

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020 and of the Clean Air Act and is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a, 3 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020 Section 26].
2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a, 6 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
3. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:
 - a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;
 - b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
 - c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the conditions of this permit [Section 1a, 7,8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].

SECTION G - GENERAL PROVISIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a, 14 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a, 4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
8. Except for requirements identified in this permit as state-origin requirements, all terms and conditions shall be enforceable by the United States Environmental Protection Agency and citizens of the United States [Section 1a, 15 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a, 10 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3)(b)].
11. This permit does not convey property rights or exclusive privileges [Section 1a, 9 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].
12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Environmental and Public Protection or any other federal, state, or local agency.
13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3)(d)].
14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3)(a)].
15. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

SECTION G - GENERAL PROVISIONS (CONTINUED)

16. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of issuance. Compliance with the conditions of a permit shall be considered compliance with:
 - a. Applicable requirements that are included and specifically identified in the permit and
 - b. Non-applicable requirements expressly identified in this permit.
- (b) Permit Expiration and Reapplication Requirements
 1. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].
 2. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020 Section 8(2)].
- (c) Permit Revisions
 1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).
 2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.
- (d) Construction, Start-Up, and Initial Compliance Demonstration Requirements

None
- (e) Acid Rain Program Requirements
 1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

SECTION G - GENERAL PROVISIONS (CONTINUED)**(f) Emergency Provisions**

1. Pursuant to 401 KAR 52:020 Section 24(1), an emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - a. An emergency occurred and the permittee can identify the cause of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - d. Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.01-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
 - e. This requirement does not relieve the source of other local, state or federal notification requirements.
2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].
3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:

RMP Reporting Center
P.O. Box 1515
Lanham-Seabrook, MD 20703-1515.

2. If requested, submit additional relevant information to the Division or the U.S. EPA.

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.

SECTION G - GENERAL PROVISIONS (CONTINUED)

- b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166
 - e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

SECTION H - ALTERNATE OPERATING SCENARIOS

None

SECTION I - COMPLIANCE SCHEDULE

None